

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF INDIANA  
HAMMOND DIVISION

UNITED STATES OF AMERICA    )  
  )  
                                  v.                    Case No. 2:19-CR-00140-PPS-JEM  
  )  
MICHAEL A. CHRISTIANSON        )

**BILL OF PARTICULARS**

The United States of America, by and through its counsel and pursuant to this Court’s Order (DE # 355), hereby particularly alleges which images contained in Defendant’s “trilogy” of children’s books that the government may contend at trial are visual depictions involving minors engaging in sexually explicit conduct as defined in 18 U.S.C. § 2256(2)(A):

- **“Hey Uncle Buck! What Is a Boy? What Is a Girl?”  
(approximately 22 images)**
  - Cover Page – photo of infant child and inset are photos of a child’s vagina and a flaccid penis
  - Page 10 – (text on prior page reads: “YAY! A baby is BORN...”) close-up photo of child’s penis
  - Page 26 – photo of one naked boy and two naked girls
  - Page 40 – (text reads: “Weenie” and “Balls”) inset photo of penis
  - Page 42 – photo of two male minors with penises visible
  - Page 44 – photo of naked male child
  - Page 50 – photo of naked female child holding animal
  - Page 54 – 3 close-up photos of penises (labeled “Baby boy” “Big boy” and “Tween boy”)
  - Page 60 – close-up photo of erect penis (labeled “Boner!”)
  - Page 62 – 3 close-up photos of vaginas (labeled “Baby girl” “Big girl” and “Tween girl”)
  - Page 64 – photo of naked female girl

- Page 65 – photo of two naked female girls eating ice cream
- Page 66 – photo of two naked female girls hugging
- Page 68 – close-up photo of penis touching vagina
- Page 70 – close-up photo of penis penetrating vagina
- Page 74 – photo of girl lying on her back with underwear at her knees, vagina is focal point
- Page 76 – photo of two naked males on bed
- Page 78 – photo of three naked girls
- **“A Beautiful, Daring, Very Amazing, Barely Naked, Body Book!”  
(approximately 15 images)**
  - Page 54 – close up of vagina
  - Page 56 – close up of vagina (labeled “VAGINA” and “VULVA”)
  - Page 62 – photo of three boys, two clearly naked, with one boy’s penis visible
  - Page 64 – photo of two naked boys holding hands
  - Page 65 – photo of three naked boys
  - Page 68 – photo of naked boy on dock and adult male in water
  - Page 69 – photo of two naked males in embrace kissing
  - Page 70 – photo of naked boy and naked girl with adult on beach
  - Page 72 – photo of naked boy near water
  - Page 74 – photo of naked boy
  - Page 80 – close-up photo of penis in hand
  - Page 82 – photo of penis on top of vagina
  - Page 84 – photo of penis penetrating vagina
  - Page 86 – photo of two erect penises held by hand
  - Page 90 – photo of erect penis
- **“Grandpa Has a Ding-a-Ling (for Those Who Care)”  
(approximately 17 images)**
  - Cover Page – close-up photos of penises, at least one of which appears to depict a minor
  - Page 16 – photo of four naked boys in the woods
  - Page 20 – inset photo of naked boy (below two other inset photos of children undressing)
  - Page 22 – photo of naked boy on chair

- Page 24 – inset photo of naked boy
- Page 26 – photo of boy lying on bed with erect penis held up by foot, inset photos of penises
- Page 28 – inset photo of naked girl
- Page 30 – inset photo of goy holding white shirt
- Page 32 – 3 inset photos of penises
- Page 38 – 3 inset images, one depicting penis penetrating vagina, one depicting naked girl with legs spread, one depicting open mouth on penis
- Page 42 – photo of naked boys
- Page 44 – 2 inset photos showing naked or partially naked boys

Dated: May 20, 2021

Respectfully submitted,

GARY T. BELL  
Acting United States Attorney

By: /s/ Jill R. Koster  
Jill R. Koster

/s/ Molly Kelley  
Molly Kelley  
Assistant United States Attorneys  
United States Attorney's Office  
5400 Federal Plaza, Suite 1500  
Hammond, IN 46340  
Telephone: 219-937-5660

**CERTIFICATE OF SERVICE**

I hereby certify that on May 20, 2021, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system and arranged for a copy to be mailed to Michael A. Christianson at the following location via certified mail:

**Michael A. Christianson**  
18031-027  
Kankakee County Detention Center JCDC  
Prisoner ID #513110  
3050 Justice Way  
Kankakee, IL 60901  
PRO SE

By: /s/ Jill Koster  
**JILL KOSTER**  
United States Attorney's Office  
5400 Federal Plaza, Suite 1500  
Hammond, IN 46340  
Telephone: 219-937-5660